

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT STATEMENT OF BASIS

Conditional Major/Synthetic Minor Permit ID: F-03-029 (Revision 2)
BLUEGRASS STATION DIVISION, 5751 BRIAR HILL ROAD, LEXINGTON, KY 40516-9721

January 5, 2007

BRIAN BALLARD, REVIEWER

Plant ID: 021-067-00032

Activity ID: APE20060003

Agency Interest #: 1022

CHANGES TO THE PERMIT (REVISION 2)

An application for a minor revision to permit F-03-029 (Revision 1) was received by the Division on October 31, 2006. This revision reflects the changes specified in the application and changes that have occurred since the permit was last revised. Additional information in response to a Division notice of deficiency letter was received on January 5, 2007.

EP01:

The VOC control efficiency of the activated carbon adsorption system is changed to 56 percent to reflect the results of the performance test conducted on the Helicopter Paint Booth on June 7, 2005. The particulate matter control efficiency of the three-stage filter system is changed to 98 percent to reflect the results of the performance test conducted on the Helicopter Paint Booth on December 13, 2005. This particulate matter control efficiency is applied to all other three-stage filter systems of similar design identified in the permit.

EP02, EP03 & EP04:

The particulate matter control efficiency of the three-stage filter systems is changed to 98 percent.

EP05:

EP05 (18), Blast Cabinet is deleted from the permit. EP05 (18a), Blast Cabinets will no longer have a weekly qualitative opacity reading requirement since this operation vents inside the building during normal operating conditions.

EP06:

EP06 (19a), Sanding Booth is deleted from the permit. The EP06 (19), Blasting Booth, description is updated to reflect that this booth is now located in bay 3E. The Blasting Booth will no longer have a weekly qualitative opacity reading requirement since this operation vents inside the building during normal operating conditions.

EP07 & EP08:

The particulate matter control efficiency of the three-stage filter systems is changed to 98 percent.

EP09 & EP10:

These points are deleted from the permit.

EP14:

This emergency generator is moved from Section B to Section C, Insignificant Activities, since it is rated at less than 500 horsepower and operates less than 500 hours per year.

CHANGES TO THE PERMIT (REVISION 2)

The following points are being added to the permit with this revision:

EP17:

A new emergency generator located in Building 3. It is rated at 2,220 horsepower and will have an operating schedule of less than 500 hours per year. The unit is diesel fuel-fired.

EP18:

Point is located in Building 1 and listed in Section C of the permit. It is a 27 horsepower, diesel fuel-fired generator with an operating schedule of less than 500 hours per year.

EP19:

Point is located in Building 12 and listed in Section C of the permit. It is a 102 horsepower, diesel fuel-fired generator with an operating schedule of less than 500 hours per year.

EP20:

Point is located in Building 10 and listed in Section C of the permit. It is a 0.2 mmBTU, waste oil fuel-fired space heater.

EP21:

A new paint booth located in Building 192. This unit will employ one HVLP spray gun. It will be used to paint small parts. The booth is equipped with a three-stage filter system that has a particulate matter control efficiency of 98 percent. The natural gas-fired drying oven associated with this booth is listed in Section C of the permit.

EP22:

Point is two new paint booths located in Building 3C. Each booth employs one HVLP spray gun. The booths are used to paint small parts. Particulate emissions from the booths are controlled by a three-stage filter system with a control efficiency of 98 percent. Two natural gas-fired ovens are associated with each booth and are listed in Section C of the permit.

EP23:

Point is a new fiberglass lay-up / sanding booth located in Building 220D.

APPLICABLE REGULATIONS:

401 KAR 63:060. List of hazardous air pollutants, petition process, lesser quantity designations, and source category list.

401 KAR 63:020 – Potentially Hazardous Matter or Toxic Substances, applies to the potentially hazardous matter and toxic substance emissions from affected facilities.

401 KAR 59:010, New Process Operations, applies to the particulate matter emissions from affected facilities constructed on or after July 2, 1975.

EMISSION AND OPERATING CAPS DESCRIPTION:

Bluegrass Station Division has requested voluntary permit limits of less than 90.0 tons per year of volatile organic compounds (VOC), 9.0 tons per year of individual hazardous air pollutant (HAP) and 22.5 tons per year of combined HAPs.

PERIODIC RECORDKEEPING:

The permittee shall maintain monthly records of the purchase and usage of the paints and solvents or any VOC/HAP containing material. The permittee shall also maintain monthly records of the volume of natural gas burned. VOC/HAP emissions shall be calculated and recorded on a *monthly* basis. These records shall be summarized in tons per month VOC/HAP emissions; subsequently, tons of VOC/HAP emissions per rolling 12-month period shall be recorded. In addition, these records shall demonstrate compliance with VOC/HAP emission limitations listed herein for the conditional major limitations. These records, as well as purchase orders and invoices for all VOC/HAP containing materials, shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the Division upon request.

OPERATIONAL FLEXIBILITY: NA**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.